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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC D/B/A SUNRISE HOSPITAL
& MEDICAL CENTER,

Plaintiff,

v.

LOCAL 1107 OF THE SERVICE
EMPLOYEES INTERNATIONAL UNION,

Defendant.

CASE NO.: 2:24-cv-01247

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(First Request)

Pursuant to Local Rule IA 6.1 and 26-3, the Parties to this action, acting by and through their respective counsel of record, hereby stipulate and request the Court to order that all discovery deadlines be extended by 45 days. This is the first request for an extension of these deadlines. In support of this Stipulation and Order, the Parties state as follows:

1. Plaintiff commenced this action by filing the Complaint on July 10, 2024 [ECF No. 1]. The Complaint was served on or about July 12, 2024.
2. Plaintiff filed a Motion for Preliminary Injunction [ECF No. 11] on August 1, 2024.
3. Defendant filed a Motion to Dismiss Complaint [ECF No. 12] on August 2, 2024. Briefing on the Motion to Dismiss was complete on or about August 22, 2024.
4. Defendant filed their Response to the Motion for Preliminary Injunction [ECF No. 22] on August 16, 2024 and the Motion was fully briefed by August 22, 2024.

1 5. The Parties submitted a Proposed Joint Discovery Plan [ECF No. 27] on
2 September 16, 2024, which was approved by the Order of the Magistrate Judge, which was
3 entered on September 18, 2024 [ECF No. 28].

4 6. The Parties exchanged initial disclosures on October 9 and October 16, 2024,
5 respectively.

6 7. On October 23, 2024, the Court issued its Order [ECF No. 30] Granting in Part
7 the Motion to Dismiss Complaint, and denying the Motion for Preliminary Injunction.

8 8. On October 30, 2024, Defendant served Requests for Admissions, Requests for
9 Production of Documents, and Interrogatories upon the Plaintiff. The Parties agreed to an
10 extension of time, and Plaintiff served its responses on December 16, 2024.

11 9. On December 19, 2024, Defendant filed its Answer to the Complaint [ECF No.
12 31].

13 10. On December 19, 2024, Plaintiff served Requests for Admissions, Requests for
14 Production of Documents, and Interrogatories upon the Defendant.

15 11. Defendant has given notice that it regards various of Plaintiff's discovery
16 responses as inadequate ("Discovery Disputes") and the Parties have noted that year-end
17 holidays are upon us and that the court-ordered discovery period is set to close on January 29,
18 2025. Accordingly, the Parties have agreed to jointly seek, through this stipulation, an
19 extension of the discovery cut-off and all later deadlines by 45 days, as they believe this will
20 allow the Parties the time needed to resolve the Discovery Disputes and to complete discovery.

21 12. This request for an extension of time is not sought for any improper purpose or
22 other purpose of delay. Rather, the Parties agree that an extension of the discovery cut-off date,
23 and all later deadlines is necessary to permit sufficient time to complete discovery and/or to
24 either resolve the Discovery Disputes or to present them to the Magistrate Judge for a ruling.

25 13. This request is being made more than 21 days before the discovery cut-off of
26 January 29, 2024.

WHEREFORE, the Parties respectfully request that the Court extend the deadlines as stated below:

Scheduled Event	Current Deadline	Proposed Deadline
Amending pleadings / adding parties	October 31, 2024	Same (passed)
Initial Expert Witness Disclosure	December 2, 2024	Same (passed)
Rebuttal Expert Witness Disclosure	January 2, 2025	Same (no experts were disclosed)
Discovery Cut-Off	January 29, 2025	March 17, 2025
Dispositive Motion Deadline	February 28, 2025	April 16, 2025
Joint Pre-Trial Order Deadline	March 31, 2025	May 16, 2025 (or 30 days after decision on the dispositive motions)

DATED this 23rd day of December, 2024.

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HALL PRANGLE, & SCHOONVELD, LLC

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IT IS SO ORDERED.



Hon. Maximiliano D. Couvillier III
United States Magistrate Judge

DATED: 12/30/2024